

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF OKLAHOMA

OKLAHOMA STATE DEPARTMENT )  
OF EDUCATION, a political subdivision )  
of THE STATE OF OKLAHOMA )  
Plaintiff, )

v. )

THE UNITED STATES OF AMERICA, )

MIGUEL CARDONA, in his official )  
capacity as the Secretary of Education, )

Cause No.: CIV-24-459-JD

UNITED STATES DEPARTMENT OF )  
EDUCATION, )

CATHERINE LHAMON, in her official )  
Capacity as Assistant Secretary for Civil )  
Rights, Department of Education, )

RANDOLPH WILLS, in his official )  
Capacity as Deputy Assistant Secretary for )  
Enforcement, Department of Education )  
Defendants. )

PLAINTIFF'S RESPONSE TO ORDER TO SHOW CAUSE

COMES NOW, Michael T. Beason, General Counsel for the Oklahoma State Department of Education ("Plaintiff") and files this Response to Order to Show Cause. Plaintiff, in support thereof, respectfully shows as follows:

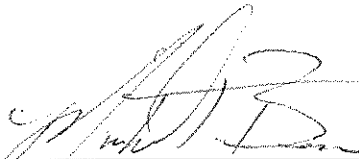
1. Plaintiff filed this case on or about May 6<sup>th</sup>, 2024. Exhibits 1&2.
2. Plaintiff mailed service of summons to Defendants, the United States, the United States Department of Education, Randolph Wills, Miguel Cardona, and Catherine Lhamon, by certified mail on June 5, 2024. Exhibits 3-22.
3. Plaintiff would show that on or about June 18, 2024, service of summons was received by the United States. Exhibits 3-6.

4. Plaintiff would show that on June 20, 2024, service of summons was received by the United States Department of Education. Exhibits 7-10.
5. Plaintiff would show that on June 20, 2024, service of summons was received by Randolph Wills. Exhibits 11-14.
6. Plaintiff would show that on June 20, 2024, service of summons was received by Miguel Cardona. Exhibits 15-18.
7. Plaintiff would show that on June 20, 2024, service of summons was received by Catherine Lhamon. Exhibits 19-22.
8. This Court ordered Plaintiff to show cause ("Order") within fourteen (14) days of the date of issuance of the Order as to why service had not been timely made upon Defendants. Exhibit 23.

RELIEF REQUESTED

Plaintiff respectfully requests that the proof of service upon all Defendants attached hereto as exhibits and incorporated by reference be deemed sufficient and that this case proceed to trial.

WHEREFORE, the Plaintiff prays for the entirety of the relief requested herein and for such further relief which may be warranted and proper.



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